

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff

vs.

RICHARD J. HARLEY,

Defendant

No. 3:12-CR-224

Honorable A. Richard Caputo

(Electronically Filed)

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**MOTION OF DEFENDANT, RICHARD J. HARLEY, FOR AN EXTENSION OF  
TIME TO FILE A BRIEF IN SUPPORT OF POST-TRIAL MOTIONS**

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1. The Defendant, Richard Harley (“Harley”), was charged in a 23 count indictment reported on August 30, 2012.
2. Harley was convicted by a jury of all 23 counts on December 16, 2014.
3. Harley filed a Motion for Judgment of Acquittal and a New Trial on December 30, 2014.
4. On January 9, 2015, the Court authorized Harley 14 days after the receipt of the transcripts of the trial to file a Brief in Support of Post-Trial Motions.
5. Harley’s counsel received the last part of the trial transcript on Wednesday May 27, 2015 which established Wednesday June 10, 2015 as the due date of his Brief in Support of Post-Trial Motions.
6. Harley’s counsel needs an additional 7 days to complete the Brief in Support of Post-Trial Motions and request that the Court extend the time for the filing of the Brief to Wednesday June 17, 2015.

Respectfully submitted,

/s/ Joseph A. O'Brien, Esquire  
Joseph A. O'Brien, Esquire  
*Attorney for Defendant, Richard J. Harley*  
Attorney ID: 22103  
Oliver, Price & Rhodes  
1212 South Abington Road  
P.O. Box 240  
Clarks Summit, PA 18411  
Tel: 570-585-1200  
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**CERTIFICATE OF CONCURRENCE**

I, Joseph A. O'Brien, counsel for the Defendant, Richard J. Harley, in the above matter, hereby certify that I have discussed the contents of this MOTION OF DEFENDANT, RICHARD J. HARLEY, FOR AN EXTENSION OF TIME TO FILE A BRIEF IN SUPPORT OF POST-TRIAL MOTIONS, with the United States Attorney, and that he does **concur** in the MOTION.

Respectfully submitted,

/s/ Joseph A. O'Brien, Esquire  
Joseph A. O'Brien, Esquire  
*Attorney for Defendant, Richard J. Harley*  
Attorney ID: 22103  
Oliver, Price & Rhodes  
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**CERTIFICATE OF SERVICE**

I, **Joseph A. O'Brien, Esquire**, of Oliver, Price & Rhodes, hereby certify that on the 9<sup>th</sup> day of June, 2015, I caused the foregoing MOTION OF DEFENDANT, RICHARD J. HARLEY, FOR AN EXTENSION OF TIME TO FILE A BRIEF IN SUPPORT OF POST-TRIAL MOTIONS to be filed via the Court's ECF system. I certify that the following participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system:

Bruce D. Bandler, Esquire  
U.S. Attorney's Office  
Room 217, Federal Building  
228 Walnut Street  
Harrisburg, PA 17108

Respectfully submitted,

/s/Joseph A. O'Brien, Esquire  
*Attorney for Defendant, Richard J. Harley*  
Attorney I.D. No.: 22103  
Oliver, Price & Rhodes  
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**ORDER**

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Now this \_\_\_\_\_ day of \_\_\_\_\_, 2015, it is hereby ordered that  
Defendant, Richard Harley, and his counsel are authorized until Wednesday, June  
17, 2015 to file a Brief in Support of Post-Trial Motions.

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A. Richard J. Caputo, U.S.  
District Judge